



New York March 29, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: LightSquared Petition for Declaratory Ruling
IB Docket No. 11-109; ET Docket No. 10-142

Dear Ms. Dortch:

On behalf of **iBanco Corp (aka m-banco)** I am writing in support of the Petition for Declaratory Ruling filed by LightSquared Inc. on December 20, 2011 and placed on public notice by the Commission on January 27, 2012.

m-Banco an innovative mobile and fixed telephone service solution that enables customers to move money nationally. It is aimed for mobile and fix telephone customers who have or do not have a bank account, either by choice, or because they do not want to have access to a bank or because they do want to save in banking cost.(Bottom of the Pyramid) A similar program was implanted in Kenya (**M-Presa**) 4 years ago being very successful.

A 2009 study by the Federal Deposit Insurance Corporation (FDIC) found that **8 percent of Americans** had no checking or savings account, and thus were defined as unbanked. An additional 18 percent had a bank account but had used an alternative financial service at least once per year and so were classified as underbanked. The same study concludes:

"The evolution of mobile technology has the potential to empower consumers and expand access to financial services for previously underserved populations. The prevalence of mobile phone access among minorities, low-income individuals, and younger generations creates the possibility of using new less expensive mobile technology to expand financial inclusion to previously underserved populations."

Federal Reserve Board Governor Elizabeth Duke last year said: "The developments in mobile financial services have only begun to exploit the potential of this technology to provide tools for consumer financial-decision making will be particularly interested to see how technology can be used to better serve lower-income populations who may be more focused on stretching their paychecks to meet monthly expenses than on investing. If you can have an app to track what you eat, certainly you could use one to track what you spend"

LightSquared wholesale-only model will allow its partners to overcome the high barriers to market entry—including potentially prohibitive network deployment and roaming costs, as well as spectrum scarcity—that could otherwise unduly raise their operating costs, or preclude them from operating altogether.



Not having the LightSquared network and its very low cost will be very difficult to operate as we will become a “tool” for the traditional “incumbents” cellular operators making the service dependable of them and by result losing it social content..

Vacating the Conditional Waiver Order addressing LightSquared's inability to address interference-related concerns surrounding its planned terrestrial operations; and (2) modification of LightSquared's license suspending its authority to build a terrestrial-based broadband network on its frequencies.rules, and provide the regulatory certainty necessary for companies like **iBanco Corp (aka m-banco)** and LightSquared to attract investment and continue developing innovative communications solutions that truly benefit the “ base of the Pyramid and other US citizens

Hundreds of millions of American (**specially the Poor**) consumers would benefit from the greater competition that would be made possible by LightSquared's network and **m-banco** social finance services consistent with the Government desire and mandate to improve the living standard of the American people.

Respectfully submitted,

A handwritten signature in black ink, consisting of a large, stylized 'R' followed by a horizontal line and a small 'J' at the end.

Randolph Kantorowicz-Toro